

P.O. BOX 5094 • GREENVILLE, S.C. 29606 • PHONE (864) 277-1620 • FAX (864) 277-8981

SURFACE ACTIVE CHEMICALS

Tuesday, November 30, 1999

Mr. Charlie Auer
US Environmental Protection Agency
Mail Code 7405
401 M Street
Washington, DC 20460

Ref: CAS Number 68412-60-2 (Phosphoric acid, mixed decyl and Et and octyl esters)

Dear Mr. Auer,

Please note that Ethox Chemical's sales on the above substance have dropped to less than 20,000 pounds per year for the calendar year 1998 and the year to date 1999. We do not expect this substance to be sold at the HPV level in the future.

Since Ethox is listed in EPA's current list as the only producer of this substance, please remove our name from the HPV list.

Sincerely,

C. V. Hinton Vice President

OPPT CBIC



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US Environmental Protection Agency
Mail Code 7405
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OPPT CBIC

Ref: HPV Status of CAS Number 68308-67-8 (Quaternary ammonium compounds, ethyldimethlysoya alkyl, Et sulfates)

Dear Mr. Auer.

Please note that Ethox's production of the above CAS Number has decreased and will continue to decrease slightly in the future. We are currently producing less than 200,000 pounds per year and will not exceed that volume in the future. I have been in contact with BASF regarding their status on this substance and they indicate that their volume in addition to Ethox does not exceed 1MM pounds and is not likely to exceed that volume in the future.

Please remove Ethox from the HPV list for the above substance.

Sincerely,

C. V. Hinton Vice President